

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

STRAGENT, LLC,

Plaintiff,

V.

**STMICROELECTRONICS, INC.,
ROBERT BOSCH LLC, BOSCH
ENGINEERING GMBH, ROBERT
BOSCH GMBH, ELEKTROBIT INC.,
ELEKTROBIT AUTOMOTIVE INC.,
ELEKTROBIT CORPORATION,
FREE SCALE SEMICONDUCTOR,
INC., FUJITSU SEMICONDUCTOR
AMERICA, INC., FUJITSU LIMITED,
INFINEON TECHNOLOGIES NORTH
AMERICA CORPORATION,
INFINEON TECHNOLOGIES AG,
MENTOR GRAPHICS
CORPORATION, RENESAS
ELECTRONICS AMERICA INC.,
RENESAS ELECTRONICS
CORPORATION, TEXAS
INSTRUMENTS INC., VECTOR
CANTECH, INC., and VECTOR
INFORMATIK GMBH.**

Defendants.

Civil Action No. 6:11-CV-00111-LED

JURY TRIAL DEMANDED

**UNOPPOSED MOTION OF DEFENDANT VECTOR INFORMATIK GMBH
TO EXTEND TIME TO RESPOND TO THE FIRST AMENDED COMPLAINT**

Pursuant to Local Rule CV-7, Defendant Vector Informatik GmbH (hereinafter “Vector Informatik”), through its attorneys, respectfully files this Unopposed Motion to Extend Time to Respond to the First Amended Complaint, seeking an extension of time in which it must respond

to the First Amended Complaint. Plaintiff's counsel has agreed to the extension. In support of this motion, Vector Informatik states as follows:

1. On March 11, 2011, Plaintiff Stragent, LLC ("Stragent") filed this action for patent infringement against several companies, including Defendant Vector Informatik. On July 19, 2011, Stragent filed an unopposed motion for leave to file a First Amended Complaint. The Court has granted Stragent's motion. Plaintiff served Vector Informatik with notice of the First Amended Complaint on or about August 15, 2011.

2. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), Vector Informatik's current due date to file a responsive pleading is on or about September 6, 2011.

3. Vector Informatik requires additional time to review the allegations in the First Amended Complaint as they pertain to it in order to prepare an appropriate responsive pleading.

4. Plaintiff has consented to Vector Informatik's request to extend the deadline for Vector Informatik to file a responsive pleading to Plaintiff's First Amended Complaint to Thursday, September 22, 2011.

5. This extension will not unduly burden any party nor cause a delay in the trial of this case.

6. Vector Informatik has not previously asked this Court for any extensions of time in this action.

WHEREFORE, Vector Informatik respectfully requests that this Court grant this Unopposed Motion to Extend Time to Respond to the First Amended Complaint and enter an order extending its deadline to file a responsive pleading up to and including September 22, 2011.

Dated: September 2, 2011

Respectfully submitted,

/s/ Glenn T. Henneberger

Charles R. Hoffmann, Esq. (*pro hac vice*)

crhdocket@HoffmannBaron.com

Glenn T. Henneberger, Esq. (*pro hac vice*)

gthdocket@HoffmannBaron.com

Hoffmann & Baron, LLP

6900 Jericho Turnpike

Suite 200

Syosset, New York 11791-4407

Telephone: 516.822.3550

Facsimile: 516.822.3582

and

David Burgert

Texas Bar No. 03378300

E-Mail: dburgert@porterhedges.com

John Irvine

Texas Bar No. 10423300

jirvine@porterhedges.com

Texas Bar No.

Porter & Hedges, LLP

100 Main Street, 36th Floor

Houston, Texas 77002-2764

Telephone: 713.226.0600

Fax: 713.228.1331

Attorneys for Defendant Vector Informatik GmbH

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Unopposed Motion of Defendant Vector Informatik GmbH to Extend Time to Respond to the First Amended Complaint is being served on all counsel of record who are deemed to have consented to electronic service and are being served via transmission of Notices of Electronic Filing generated by CM/ECF pursuant to Local Rule CV-5(a)(3) on September 2, 2011.

/s/ Glenn T. Henneberger

Glenn T. Henneberger